



16 July 2013

David Piper
Chemicals Branch DTI
United Nations Environment Programme
International Environment House
11-13 Chemin des Anémones
CH-1219 Châtelaine
Geneva, Switzerland

Dear David,

Thank you for the opportunity to provide input on the new UNEP global mercury cement partnership draft business plan.

The Zero Mercury Working Group¹ would like to see the business plan focus on capacity assistance activities useful to the variety of governments with cement production facilities. Such assistance activities would include development of materials and workshops in the following areas:

1. Employee training (including a certification program) to operate pollution controls;
2. Survey of available equipment vendors; and
3. Low cost approaches for reducing mercury content in feedstock.

We also suggest that a global facility inventory should be developed on cement production facilities. This inventory should list the number, size, location and a mapping of facilities around the globe, and, where available, include a listing of the emission reduction technologies currently employed.

We cannot support proposals to revise the partnership business plan to include development of BAT/BEP guidance. We anticipate work at the Diplomatic Convention to initiate organization of an expert group to develop BAT/BEP guidance for all the covered

¹ ZMWG is an international coalition of over 100 public interest environmental and health non-governmental organizations from 54 countries from around the world formed in 2005 by the European Environmental Bureau and the Mercury Policy Project. ZMWG strives for zero supply, demand, and emissions of mercury from all anthropogenic sources, with the goal of reducing mercury in the global environment to a minimum. For more information, see: <http://www.zeromercury.org/>.

sources in the Convention. This group will be the appropriate body to develop BAT/BEP guidance, and members of the partnership may provide input to the Convention expert group.

Regarding emission inventory work, we note governments will soon be preparing emission inventories for this sector. So we think if there is any partnership work in this area, it should be focused on refining the UNEP toolkit if that is necessary, so that governments may take advantage of such improvements.

Sincerely,

Michael T. Bender
And
Elena Lymberidi-Settimo
ZMWG Coordinators